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Written Record Only

Anthony Harrison
18-7-5

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Hon. Mary D. Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814
(Delivered by hand at the Public Hearing)

RE: COMMENTS OF CHARGEPOINT ON THE PROPOSED AMENDMENTS TO THE “DEEMED TO COMPLY” PROVISION FOR THE LEV III GREENHOUSE GAS EMISSION REGULATIONS

I. INTRODUCTION

ChargePoint appreciates this opportunity to provide comments in response to the California Air Resources Board’s (CARB) *Proposed Amendments to the “Deemed to Comply” Provision for the LEV III Greenhouse Gas Emission Regulations* for model years affected by pending Federal rulemakings.

ChargePoint is the largest commercial electric vehicle charging network in the world, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town and on the road. ChargePoint has more than 54,000 independently owned charging spots, including over 32,000 in California, and thousands of customers (including workplaces, cities, retailers, apartments, hospitals and fleets). ChargePoint is the only charging technology company on the market that designs, develops and manufactures hardware and software solutions across every market sector. ChargePoint drivers have completed more than 40 million charging sessions, saving upwards of 41 million gallons of gasoline and driving more than 1 billion gas-free miles.

II. DISCUSSION

ChargePoint strongly supports CARB's intent to provide a pathway to ensure that sound and justified policies that reduce greenhouse gas emissions from the transportation sector remain in place. It is vital that CARB take all available action to preserve California's authority to enforce fuel efficiency standards that promote adoption of electric transportation, including those provided through the State's Clean Air Act Preemption Waiver. ChargePoint supports the intent of the proposed amendment to California's LEV III emissions regulations, as they ensure that any change to Federal fuel efficiency standards would not take effect in California. In addressing the "deemed to comply" provision under existing policy established in 2012, CARB takes an important step in solidifying standards that protect and enhance current trends in industry toward electrification.

ChargePoint applauds CARB for its opposition to the currently proposed Safe Vehicles Rule, a wide-ranging reform of fuel efficiency standards that, if finalized, would have sweeping, industry-wide impacts on the automotive sector. ChargePoint strongly opposes the proposed rule, as it would inject uncertainty into the auto industry, rollback the significant gains of electrification in states across the nation, and dramatically affect the United States global leadership in electrification and advanced transportation technologies. More specifically, the SAFE Vehicles Rule represents a major setback for the growing electric vehicle industry and would prevent communities nationwide from realizing all of the benefits of electrification.

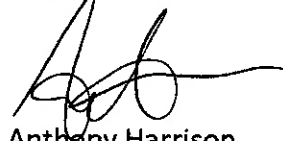
Any action taken by CARB to preserve the authority under the Waiver should include continued support of the critical Zero Emission Vehicle ("ZEV") Program, which requires sales of electric cars and trucks in California. The ZEV program requirements have led automakers to

introduce more EVs to market in states beyond California, providing consumers with electric model options at dealerships. Simply put, the California Waiver has enabled greater EV penetration in markets nationwide, allowing states and communities to reap the benefits of electrification.

III. CONCLUSION

In summary, ChargePoint believes that CARB should take all available action to ensure the California's Waiver remains intact and keeping solid standards for industry in place will maintain the US automotive sector's growth and innovation in electrification. Doing so will support that State's ability to meet the goal of deploying 250,000 charging stations by 2025, and reaching 5 million ZEVs on the road by 2030. ChargePoint looks forward to working with CARB staff and stakeholders as this process moves forward.

Regards,



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